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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., HENDRINA VIVAS
CASTILLO, A.C.A., SHERIKA BLANC, VILES
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**STIPULATION AND ~~PROPOSED~~
ORDER RE: BRIEFING SCHEDULE FOR
PARTIES' CROSS-MOTIONS FOR
SUMMARY JUDGMENT**

Assigned to: Hon. Edward M. Chen

Complaint filed: February 19, 2025

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Pursuant to Civ. L.R. 6-1(b), 6-2 and 7-12, the Parties, by and through their respective counsel, submit this stipulation and [proposed] order regarding the briefing schedule for the Parties' cross-motions for summary judgment.

WHEREAS, on April 30, 2025, pursuant to the Parties' stipulation, this Court set the following briefing schedule for the Parties' Cross-Motions for Summary Judgment:

- Plaintiffs shall file their Motion for Summary Judgment on or before May 26, 2025.
- Defendants shall file an Opposition to Plaintiffs' Motion for Summary Judgment and their Motion for Summary Judgment on or before June 10, 2025.
- Plaintiffs shall file their Reply in further support of their Motion for Summary Judgment and their Opposition to Defendants' Motion for Summary Judgment on or before June 20, 2025.
- Defendants shall file their Reply to Plaintiffs' Opposition to Defendants' Motion for Summary Judgment on or before June 27, 2025.
- The Court shall hear argument on the Parties' Cross-Motions for Summary Judgment on July 11, 2025. Dkt. 124.

WHEREAS, on May 9, 2025, this Court granted Parties' stipulated request that Plaintiffs file their Motion for Summary Judgment on or before May 27, 2025, in light of the Memorial Day holiday on May 26, 2025. The briefing schedule for the Parties' Cross-Motions for Summary Judgment otherwise remained the same. Dkt. 134.

WHEREAS, on May 19, 2025, pursuant to Court Order, (*see* Dkts. 135, 143), Defendants produced 77 documents responsive to Plaintiffs' first, second and sixth requests for production; and

WHEREAS, on May 22, 2025, Defendants' counsel emailed Plaintiffs' counsel to notify Plaintiffs that 159 documents from USCIS custodians that were potentially responsive to Plaintiffs' requests for production were inadvertently not batched out for review. Defendants' counsel stated that they intended to have the documents reviewed, and responsive, non-privileged documents produced, by May 27, 2025, and offered to adjust the briefing schedule on the Parties' cross-motions for summary judgment to accommodate this belated production.

IT IS THEREFORE STIPULATED AND AGREED, by the Parties and subject to the

approval of the Court:

- Plaintiffs shall file their Motion for Summary Judgment on or before June 3, 2025.
- Defendants shall file their Opposition and Cross-Motion for Summary Judgment on or before June 17, 2025.
- Plaintiffs shall file their Reply in further support of their Motion for Summary Judgment and their Opposition to Defendants' Motion for Summary Judgment on or before June 27, 2025.
- Defendants will waive their Reply in further support of their Motion for Summary Judgment.
- The Court will hear argument on the Parties' Cross-Motions for Summary Judgment on July 11, 2025.

IT IS SO STIPULATED.

Date: May 23, 2025

Respectfully submitted,

ACLU FOUNDATION
OF NORTHERN CALIFORNIA

/s/ Emilou MacLean
Emilou MacLean
Attorneys for Plaintiffs

Date: May 23, 2025

U.S. DEPARTMENT OF JUSTICE

/s/ Anna Dichter
Anna Dichter
Attorneys for Defendants

SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that each of the other Signatories have concurred in the filing of this document.


ACLU FOUNDATION
OF NORTHERN CALIFORNIA

/s/ Emilou MacLean
Emilou MacLean

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 27, 2025



The Honorable Edward M. Chen
United States District Judge